

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

TYRONE WOOLASTON,

Defendant.

: INFORMATION

: 18 Cr. _____

:
18 CRIM 212

:
JUDGE SWEET

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COUNT ONE

(Narcotics Conspiracy)

The United States Attorney charges:

1. From in or about May 2015, up to and including in or about February 2018, in the Southern District of New York and elsewhere, TYRONE WOOLASTON, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that TYRONE WOOLASTON, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that TYRONE WOOLASTON, the defendant, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Use of a Firearm in Furtherance of Count One)

4. In or about February 2018, in the Southern District of New York and elsewhere, TYRONE WOOLASTON, the defendant, during and in relation to a drug trafficking crime for which WOOLASTON may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Information, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Information, TYRONE WOOLASTON, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

6. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

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(21 U.S.C. § 846; 18 U.S.C. § 924(c).)

GEOFFREY S. BERMAN

United States Attorney.
